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Comment Letter From Sonoma County Interests on California Forest Carbon Plan Concept Paper (March 9, 2016)

April 8, 2016

Submitted Via Email: fcats.fire@fire.ca.gov

Dear Chair Pimlott and Members of the Forest Climate Action Team:

As a broad coalition of Sonoma County agencies, organizations, and individuals, we offer the following comments on the March 9, 2016 *"California Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Changing Climate (Concept Paper)"*. We applaud the leadership of the FCAT, and the stated vision of the Concept Paper, and we appreciate the several years of work that have resulted in this implementation strategy for the AB 32 Scoping Plan.

Introduction and Background

Although we are not providing detailed comments on the Concept Paper we are very supportive of the vision, purpose and scope, goals and management strategies, analytical approach and implementation and investment mechanisms in the Paper. We would like to focus our comments on the opportunity in Sonoma County for a collaborative partnership with the state to meet the goals of AB 32 and of the Forest Carbon Plan.

Sonoma County is united and prepared to meet the stated purpose of the Carbon Plan to *"develop and implement plans to improve the health of California's forests, increase their carbon storage, and reduce their emission of carbon to the atmosphere."* Our local governments, NGOs, and community groups have a long history of planning and collaboration and have developed a common vision for Sonoma County's Forests: that they are protected and enhanced to sequester forest carbon and to achieve a broader range of benefits including healthy ecological systems, economic viability and sustainability, and possibilities for biomass utilization.

For over a decade, Sonoma County's local governments, nonprofits, and community groups have worked toward the common vision of preserving and enhancing our forests' ecological and economic health, viability, and sustainability. Sonoma County's NGOs and local government agencies have been thought leaders and early adopters of comprehensive plans for reducing greenhouse gas emissions, ensuring strategic and integrated land use and transportation policies, managing our water supplies in a sustainable manner, and investing locally in agricultural, forest and natural resource land conservation. Our collective efforts demonstrate recognition of the critical roles that forest protection and management play as part of a comprehensive response to climate change. We have multiple partners who plan, study, educate, protect, enhance, and manage our forestlands. Our work here to maintain the health of our forests and the viability of our forest industry can also further the state's vision and goals of AB 32 and the Forest Carbon Plan.

Recognizing Sonoma County as a "High Priority Landscape" for Implementing CalFire's Healthy Forests Program

The FCAT's Concept Paper calls for public comment to define the regional delineation and/or regional considerations that should be incorporated into applicable protection, enhancement, and innovation strategies for the Forest Carbon Plan. Given our collective work over the past ten years, Sonoma County should be considered a "high-priority landscape" for funding from the Healthy Forests Program proposed by CalFire in the FY 2016-2017 budget. Our region's unique forested landscapes, ownership patterns, and forest management challenges make Sonoma County extremely well-qualified for designation as a high-priority landscape where Healthy Forest Program funds may be leveraged to reap the largest direct benefits for forest resiliency, carbon sequestration, and other co-benefits.

The Forests of Sonoma County

Sonoma County's 513,000 acres of coniferous forests and oak woodlands represent 50% of the county's land base, representing a large-scale, rural, forested landscape that provides a host of valuable ecological, economic, and social benefits. However, both local and state-wide trends in forest ownership and climate-related impacts create a host of management challenges that threaten the viability of our forested landscapes:

- Sonoma County is the most highly parcelized county in California. Most of the oak woodland, and over with 68% of our coniferous forestland, is held in private ownerships of 50 acres or less.^{1,2}

¹ Euphrat, F. D., S. Swain, D. Swanhuysen, J. Butler, A. Chesnut, K. Batchelder, C. Safford, and E. Cummings. 2011. Protecting forests across landscapes and through generations: the Sonoma County Forest Conservation Working Group. U.S. Forest Service General Technical Report PSW-GTR-238. Accessed online 1 April 2016. http://www.fs.fed.us/psw/publications/documents/psw_gtr238/psw_gtr238_603.pdf

- Rural residential housing pressure and a growing population is increasing our wildland-urban interface.
- Population growth, regulatory requirements, and economic changes are leading to increased pressure to convert forests and woodlands to other uses.^{3,4}
- Pathogens like Sudden Oak Death and insects such as pine/fir borer beetles are devastating our trees, creating hazards for rural communities, increasing our fire risk, and reducing the carbon sequestration of our woodlands.⁴

Our county's carbon accounting tools and plans demonstrate that our forested landscapes, including redwood forests and urban forests, have high levels of carbon stock as well as the potential to sequester even more carbon.⁵ At the same time, our forests and rural communities are at risk of wildfire due to the lack of forest management practices on privately owned forest parcels. Our forests suffer from sudden oak death and insect outbreaks, creating hazards from falling trees and increased wildfire risk in rural residential areas.⁶ Forest management is greatly needed to ensure that our forests continue to sequester carbon and provide GHG reduction benefits.

Our forests also provide a number of co-benefits. We have two of the last remaining commercial forestry mills on the North Coast. It is imperative that we help these mills and our forest industry remain economically viable both for the health of our forests and our rural communities. Additionally, we have many opportunities to explore and develop biomass utilization and co-generation, which will provide new income sources for our forest industry and mills as well as generate renewable energy sources for Sonoma County.

² Fire Safe Sonoma. 2016. Sonoma County Community Wildfire Protection Plan. Accessed online 1 April 2016. <http://www.firesafesonoma.org/main/docs>

³ Euphrat, F. D., S. Swain, D. Swanhuysen, J. Butler, A. Chesnut, K. Batchelder, C. Safford, and E. Cummings. 2011. Protecting forests across landscapes and through generations: the Sonoma County Forest Conservation Working Group. U.S. Forest Service General Technical Report PSW-GTR-238. Accessed online 1 April 2016. http://www.fs.fed.us/psw/publications/documents/psw_gtr238/psw_gtr238_603.pdf

⁴ Fire Safe Sonoma. 2016. Sonoma County Community Wildfire Protection Plan. Accessed online 1 April 2016. <http://www.firesafesonoma.org/main/docs>

⁵ The Nature Conservancy and Sonoma County Agricultural Preservation and Open Space District. 2015. Conserving landscapes, protecting the climate: The climate action through conservation project. San Francisco and Santa Rosa, CA. Accessed online 1 April 2016. http://scienceforconservation.org/dl/CATC_Final_Jan2016.pdf

⁶ University of California Cooperative Extension, Sonoma County, Sonoma County Department of Emergency Services. 2008. Sonoma County Sudden Oak Death Strategic Response Plan. http://www.firesafesonoma.org/main/sites/default/files/sodsr_plan.pdf

Sonoma County's Wildfire Risk

Sonoma County has a history of devastating wildfires. CalFire has identified several “historical wildfire corridors” in our county that have together burned several hundred thousand acres in the past century, damaging homes and structures.⁷ Each year we face the potential of experiencing a catastrophic wildfire, and this risk is likely to increase in the years to come as a result of climate change. In addition to the management challenges cited above, the following are some factors that contribute to our wildfire risk:

- Approximately one-third of the county's 495,000 residents reside in Sonoma County's Wildland/Urban Interface (WUI), where wildland fuels intermix with homes and structures.⁷
- Most of Sonoma County's WUI areas are identified by CalFire as high or very high fuel rank/potential, high or very high fire hazard severity zones, and high or very high fire threat zones.⁷
- Our “State Responsibility Area” is wildland-urban interface, representing nearly 80% of the county's acreage.⁷
- Northeastern Sonoma County contains the largest number of acres in the county that are classified in the Very High Fire Severity zone.⁷ This area includes the forested upper watershed of Lake Sonoma and part of the Russian River Watershed, which provides drinking water to over 600,000 people.
- Most of the WUI is served by volunteer or “combination” fire departments. However, some volunteer departments are finding it hard to attract new members and retain volunteers. Because volunteers may work in urban centers, their response time to fires in rural areas may be delayed.⁷

Sonoma County's WUI residents are extremely concerned about wildfire safety. However, many lack the knowledge and financial resources to manage their forests for reduced wildfire risk. The following are some factors contributing to the difficulty of our WUI residents' ability to manage their lands for wildfire risk reduction:

- The costs of mechanical clearing and/or prescribed burning are prohibitive for many of Sonoma County's landowners, both small and large.⁷

⁷ Fire Safe Sonoma. 2016. Sonoma County Community Wildfire Protection Plan. Accessed online 1 April 2016. <http://www.firesafesonoma.org/main/docs>

- Grant funding is a crucial component to mitigate the risk of wildland fire by landowners, yet CalFire's California Forest Improvement Program (CFIP) is usually only able to fund approximately 10 projects in the county each year.⁷
- Sonoma County has virtually no federal lands, which decreases our access to some federal grant programs which fund fuels management for communities near federal lands.

Our WUI residents are extremely interested in gaining information about making their homes and communities more wildfire safe. They are eager for more programs that can help them accomplish this goal.⁸ With new funding sources, we can provide these residents with the resources they need to implement wildfire mitigation activities on their lands and better manage our county for wildfire risk reduction.

Sonoma County's Climate Leadership and Planning Efforts

Our increasing risk of wildfire—along with emerging insects and pathogens in our forests—is symptomatic of a larger suite of climate change impacts facing Sonoma County. For over ten years, Sonoma County's community leaders and forward-thinking elected officials in each city and in county government have worked together to establish strong action on climate change. Community leadership has also resulted in direct actions by the citizens, businesses, and communities in Sonoma County to reduce GHG emissions.⁹ By 2010, Sonoma County communities had reduced countywide GHG emissions to approximately 7% below 1990 levels, even while the county's population grew by 25% and employment grew by 17% between 1990 and 2010. On a per capita basis, county GHG emissions declined approximately 26% over the same period. Our county has a demonstrated ability to foster successful collaborations between local governments and other groups – an essential component for successful implementation of the Forest Carbon Plan.

Our county's actions to address climate change are supported by rigorous regional planning efforts. These plans can be incorporated into and inform implementation of the Forest Carbon Plan. Numerous plans and studies have been prepared by Sonoma County's residents, local government agencies, organizations, and community groups as part of ongoing efforts to prepare for climate change and address the health of our forests.¹⁰ These plans emphasize the important role that forest conservation and management plays in meeting emissions reduction targets and climate adaptation goals. Some examples include the Draft Sonoma County

⁸ Fire Safe Sonoma. 2016. Sonoma County Community Wildfire Protection Plan. Accessed online 1 April 2016. <http://www.firesafesonoma.org/main/docs>

⁹ See attached appendix for a detailed history of Sonoma County's climate change leadership.

¹⁰ See attached appendix for detailed examples of Sonoma County's climate change and forest health plans.

Community Wildfire Protection Plan by Fire Safe Sonoma,¹¹ Climate Action 2020 by the Regional Climate Protection Authority¹², and the Climate Action through Conservation Project by The Nature Conservancy and Sonoma County Agricultural Preservation and Open Space District.¹³

The Concept Paper states that execution of the Forest Carbon Plan will include *“successful implementation of existing plans and modification of such plans through adaptive management.”* Sonoma County’s existing plans demonstrate that we have already identified regional, landscape-level strategic priorities and actions for climate change mitigation, adaptation, and forest health. Additionally, projects like “Climate Action through Conservation” demonstrate carbon accounting tools developed for Sonoma County that can be scaled up and/or used to inform a standardized carbon quantification method for California. These plans and tools can be implemented and adapted as needed to meet California’s broader forest health and carbon management objectives.

Sonoma County Partnerships and Collaborations

The Concept Paper states that *“collaboration of a wide range of players – land owners and managers, agencies at multiple levels of government, businesses, nongovernmental organizations, and stakeholders – is essential for implementation success, particularly for working at the landscape level.”* Sonoma County is home to a diverse and committed group of partners actively engaged in forest conservation, forest management, and climate change mitigation and adaptation efforts. We possess the necessary expertise, knowledge, and connections that can help us successfully implement the Forest Carbon Plan as well as our existing plans.

The Sonoma County Forest Conservation Working Group is a prime example of a successful collaborative effort to address our region’s forest conservation and management challenges. The working group is a highly networked, engaged, and effective coalition that works together to perpetuate sustainable, healthy, and diverse forests, woodlands, and watersheds across the Sonoma County landscape. For over a decade, the Working Group has provided knowledge and resources to forest landowners that empower them to manage their lands for forest health and resiliency. Members include forest landowners, local and regional land trusts, watershed councils, state and local agencies, and others. Active members include:

¹¹ Fire Safe Sonoma. 2016. Sonoma County Community Wildfire Protection Plan. Accessed online 1 April 2016. <http://www.firesafesonoma.org/main/docs>

¹² Regional Climate Protection Authority. 2016. Climate Action 2020 and Beyond. Accessed online 1 April 2016. http://rcpa.ca.gov/wp-content/uploads/2016/03/CA2020-Public-Review-Draft-Plan_3-4-16.pdf

¹³ The Nature Conservancy and Sonoma County Agricultural Preservation and Open Space District. 2015. Conserving landscapes, protecting the climate: The climate action through conservation project. San Francisco and Santa Rosa, CA. Accessed online 1 April 2016. http://scienceforconservation.org/dl/CATC_Final_Jan2016.pdf

- Baseline Consulting, Arthur Dawson, www.baselineconsult.com
- CalFire, Jill Butler, <http://ceres.ca.gov/foreststeward/>
- Coast Ridge Community Forest, Judy Rosales, <http://coastridgecommunityforest-org.webs.com>
- Fire Safe Sonoma, Caerleon Safford, firesafesonoma.org
- Friends of Mark West Watershed, Penny Sirota, www.markwestwatershed.org
- Forest, Soil & Water, Inc., Fred Euphrat, Ph.D., RPF, www.euphrat.org
- Gold Ridge Resource Conservation District, Brittany Heck, www.goldridgercd.org
- Greenbelt Alliance, Dee Swanhuysen, www.greenbelt.org
- Gualala River Watershed Council, Kathleen Morgan, <http://grwc.info>
- Santa Rosa Junior College, Kasey Wade, www.santarosa.edu
- Sonoma County Agricultural Preservation and Open Space District, Kim Batchelder, www.sonomaopenspace.org
- Sonoma Land Trust, Amy Chesnut, www.sonomalandtrust.org
- Sonoma Resource Conservation District, Earle Cummings, www.sonomarcd.org
- The Wildlands Conservancy, Brook Edwards, www.thewildlandsconservancy.org
- University of California Cooperative Extension, Steven Swain, <http://cemar.in.ucanr.edu>

Clearly, Sonoma County has a wealth of organizations and agencies that are actively collaborating on plans and projects across our forested landscape to address climate change and increase forest health and resiliency. The Working Group in particular is not only positioned to scale up forest management efforts on privately owned forestland, but can also help the FCAT design similar partnerships and collaborations throughout California. With the help of new financial resources, we can quickly act to expand the scope and impact of all our collaborative efforts throughout Sonoma County.

Conclusion

Our coalition is very supportive of the Governor’s proposed FY 2016-2017 budget allocation of Greenhouse Gas Reduction Funds (GGRF) to strategically invest GGRF auction proceeds into a comprehensive, landscape-scale forest health and climate resiliency program (the Healthy Forests Program). We support the use of these funds in high-priority regions to realize the largest direct benefits for greenhouse gas reduction while also providing other co-benefits, such as protection of water resources, wildlife habitat, and rural economic stability; improvements to rural forestry infrastructure; and generation of renewable energy sources from biomass and biochar while also reducing risks to life and property from wildland fire.¹⁴

Sonoma County should be considered a “high-priority landscape” for funding from the Healthy Forests Program proposed by CalFire in the FY 2016-2017 budget. Our forests are threatened by wildfire, insects, and other forest pathogens, and our forest ownership patterns create unique

¹⁴ California Department of Forestry and Fire Protection. 2015. Budget Change Proposal DF-46. State of California.

management challenges. At the same time, our agencies and organizations are already thinking about and planning for climate adaptation, mitigation, and forest health in a regional, landscape-scale context. We have identified projects, strategies, and priorities that together can maximize our local impact in addressing climate change. We possess the expertise, knowledge, and connections to effectively collaborate with others. We have scientifically supported carbon accounting tools and methodologies in place to prioritize and evaluate the performance of our forest management projects. We have great potential to increase the breadth and scope of these projects and implementation of our climate adaptation, mitigation, and forest health plans. With increased state funding, we will be able to make significant progress to protect and enhance our forests and be an innovative leader for new economic programs, such as biomass utilization and development of wood products campuses.

We thank you for the opportunity to comment on the *“California Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Changing Climate (Concept Paper).”* We look forward to continued engagement with the planning process.

Sincerely,



Sonoma Land Trust
Amy Chesnut, Acquisitions Director



Baseline Consulting
Arthur Dawson, Founder



Jill Butler, CalFire



Center for Climate Protection
Ann Hancock, Executive Director and Co-Founder



Coast Ridge Community Forest
Judy Rosales, Executive Director

Forest, Soil & Water, Inc.
Fred Euphrat, Ph.D., RPF



Fire Safe Sonoma
Caerleon Safford, Executive Coordinator



Gold Ridge Resource Conservation District
Brittany Heck, Executive Director



Greenbelt Alliance
Dee Swanhuysen, Board of Directors

Gualala River Watershed Council
Kathleen Morgan, Executive Director



AGRICULTURAL PRESERVATION
AND OPEN SPACE DISTRICT

Sonoma County Agricultural Preservation and Open Space District

Bill Keene, General Manager



Sonoma County Fire and Emergency Services Department

Al Terrell, Fire Chief and Department Director



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Suzanne Smith, Executive Director



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Sonoma Resource Conservation District
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The Wildlands Conservancy
Brook Edwards, Jenner Headlands Preserve Manager



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